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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ROQUE MARTINEZ,) Case No. 1:24-CV-01245-JLT-BAM
Plaintiff,) STIPULATION AND [PROPOSED] ORDER
vs.) FOR AN EXTENSION OF TIME
COMMISSIONER OF SOCIAL SECURITY,)
Defendant.)

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended twenty-one (21) days from May 26, 2025, up to and including June 17, 2025. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

This is the Defendant's second request for an extension. Since the last extension request, Defendant has identified a possibility for settlement of this matter and respectfully requests this extension to allow sufficient time to internally discuss, and if required, negotiate with Plaintiff's counsel. Counsel has been diligent in her work, and in the last four weeks, has completed three responsive briefs and a settlement memorandum in one case. Defendant's counsel also recently

1 contracted COVID-19 which limited her productivity. In addition to this case, counsel has eight
2 upcoming responsive briefs in the next four weeks, including a Circuit brief.

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4 Respectfully submitted,

5 Dated: May 27, 2025 By: /s/ Dolly Trompeter*
6 (*as authorized via e-mail on May 27, 2025)
7 DOLLY TROMPETER
Attorney for Plaintiff

8 Dated: May 27, 2025 MICHELE BECKWITH
9 Acting United States Attorney
10 MATHEW W. PILE
Associate General Counsel
Social Security Administration

11
12 By: /s/ Lillian J. Lee
LILLIAN J. LEE
Special Assistant U.S. Attorney
13 Attorneys for Defendant
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16 **ORDER**

17 Generally, requests for court-approved extensions brought on (or after) the required filing
date are looked upon with disfavor. L.R. 144(d). Nonetheless, in the interest of judicial and
party economy, and for cause appearing, Defendant shall have an extension, up to and including
June 17, 2025, to respond to Plaintiff's Motion for Summary Judgment.

22 IT IS SO ORDERED.
23

24 Dated: May 28, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE